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October 24, 2023

**Via Email**

Hon. Michael A. Hammer, U.S.M.J.  
United States District Court,  
District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street Room 4015  
Newark, NJ 07101

**Re: Emerson Redevelopers Urban Renewal, LLC v. Borough of Emerson and**  
**Mayor Danielle DiPaola**  
**Docket No.: 2:20-cv-04728**

Dear Judge Hammer:

We represent Plaintiff and write jointly with Defendants pursuant to the Court's text order to advise that all parties prefer to have a settlement conference in the above-referenced matter before Your Honor. The parties do not believe the expert discovery schedule should be placed on hold until the settlement conference at this time.

We look forward to meeting with Your Honor.

Respectfully submitted,

s/Joseph B. Fiorenzo  
Joseph B. Fiorenzo

cc: All counsel of record (via CM/ECF)